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Chin Legacy Gift Trust UA DTD 03/29/2022  
and Chong Legacy Gift Trust UA DTD 03/29/2022*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

MIKE COAN, Individually and On Behalf of  
All Others Similarly Situated,

Plaintiff,

v.

B. RILEY FINANCIAL, INC., BRYANT  
RILEY, TOM KELLEHER, and PHILLIP J.  
AHN,

Defendants.

Case No. LA CV 24-00662-  
SPG(AJRx)

**NOTICE OF CHIN LEGACY  
GIFT TRUST UA DTD 03/29/2022  
AND CHONG LEGACY GIFT  
TRUST UA DTD 03/29/2022'S  
MOTION FOR: (1)  
CONSOLIDATION OF THE  
RELATED ACTIONS; (2)  
APPOINTMENT AS LEAD  
PLAINTIFFS; AND (3)  
APPROVAL OF LEAD  
COUNSEL**

**CLASS ACTION**

Judge: Hon. Sherilyn Peace Garnett  
Hearing Date: April 24, 2024  
Time: 1:30 p.m.  
Courtroom: 5C

[captions continue on next page]

1 THE KL KAMHOLZ JOINT REVOCABLE  
2 TRUST, Individually and On Behalf of All  
Others Similarly Situated,

3 Plaintiff,

4 v.

5 B. RILEY FINANCIAL, INC., BRYANT  
6 RILEY, TOM KELLEHER, and PHILLIP J.  
AHN,

7 Defendants.  
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Case No. LA CV 24-02121-AB(JCx)

**NOTICE OF CHIN LEGACY  
GIFT TRUST UA DTD 03/29/2022  
AND CHONG LEGACY GIFT  
TRUST UA DTD 03/29/2022'S  
MOTION FOR: (1)  
CONSOLIDATION OF THE  
RELATED ACTIONS; (2)  
APPOINTMENT AS LEAD  
PLAINTIFFS; AND (3)  
APPROVAL OF LEAD  
COUNSEL**

**CLASS ACTION**

Judge: Hon. Andr  Birotte Jr.  
Hearing Date: April 26, 2024  
Time: 10:00 a.m.  
Courtroom: 7B

**NOTICE OF MOTION**

**TO: ALL PARTIES AND THEIR COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that on April 26, 2024, or on a date and time set by this Court, Chin Legacy Gift Trust UA DTD 03/29/2022 and Chong Legacy Gift Trust UA DTD 03/29/2022 (“Movants”), by and through their counsel, will and does hereby move this Court for an order granting Movants’ motion for: (1) consolidation of the above-captioned, related actions; (2) appointment as Lead Plaintiffs; and (3) approval of their counsel as Lead Counsel (the “Motion”).

This Motion is brought pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”) on the grounds that the above-captioned actions and any related actions that may be filed should be consolidated due to the fact that these actions raise common issues of fact and law, and consolidation under Fed. R. Civ. P. 42(a) will be more efficient for the Court and the parties involved. Movants have timely filed their Motion and are the “most adequate plaintiff[s]” under the rules of the PSLRA. Moreover, Movants meet the requirements of Rule 23 of the Federal Rules of Civil Procedure for the purposes of this Motion as their claims are typical of the other purported class members’ claims and they will fairly and adequately represent the putative class. Movants also seek the Court’s approval of their selection of Faruqi & Faruqi, LLP, a law firm with substantial experience in prosecuting securities fraud class actions, as Lead Counsel pursuant to 15 U.S.C. §§ 78u-4(a)(3)(B)(v).

This Motion is based on the accompanying memorandum of points and authorities in support hereof, the declaration of Lisa T. Omoto filed herewith, the pleadings and other filings herein, and other such written and oral argument as may

1 be permitted by the Court.

2 Dated: March 25, 2024

Respectfully submitted,

3 By: /s/ Lisa T. Omoto  
4 Lisa T. Omoto

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20 *Attorneys for [Proposed] Lead Plaintiffs Chin*  
21 *Legacy Gift Trust UA DTD 03/29/2022*  
22 *and Chong Legacy Gift Trust UA DTD*  
23 *03/29/2022 and [Proposed] Lead Counsel for the*  
24 *Class*

**STATEMENT OF COMPLIANCE WITH LOCAL RULE 7-3**

Local Civil Rule 7-3 and Section 6.b of the Standing Order of the Honorable André Birotte Jr. (ECF No. 10) (the “Court’s Standing Order”) requires a conference of counsel prior to filing motions. Due to the PSLRA’s lead plaintiff procedure, however, Movants will not know which other class members may move for appointment as Lead Plaintiff until after all the movants have filed their respective motions. Under these circumstances, Movants respectfully request that the conferral requirement of Local Rule 7-3 and Section 6.b of the Court’s Standing Order be waived.

Dated: March 25, 2024

By: /s/ Lisa T. Omoto  
Lisa T. Omoto